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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA11-27-00
FILED
HARRISBURG

NOV 24 2000

MARY B. D'ANDREA, CLERK
Per. *[Signature]* DEPUTY CLERKROBERT LEON BUCKNER, PRO SE,
Plaintiff

V.

CASE No.: 1:CV-00-1594

BUSSANICH, et al.,
Defendants

* * * * *

REQUEST FOR EMERGENCY PRELIMINARY INJUNCTION
AND RESTRAINING ORDER

COMES NOW, Robert Leon Buckner, "Plaintiff" in the above titled action, proceeding pro se and informa pauperis, respectfully moves this Honorable Court for a restraining order protecting Plaintiff from retaliatory actions taken against him by Defendants and/or their agents and employees, and; emergency preliminary injunctive relief ordering the continuation of Plaintiff's prior medical care and in support thereof states the following:

1.) That it is a well known practice of many Bureau of Prisons employees to take retaliatory actions such as transfers, falsified disciplinary adjustment reports, movement to disciplinary or administrative segregation and general harassment (i.e., unwarranted cell searches, threats, etc.), against prisoners who file actions to cure violations of their Constitutional Rights.

2.) That your Plaintiff request's this Court to issue a preliminary injunction and/or restraining order enjoining the Defendants, their agents, employees, contractors, subordinates thereto and any other person or agency from taking retaliatory actions against the Plaintiff for seeking redress and cure for the violations of his civil and Constitutional Rights during the pendency of, and/or after, this litigation.

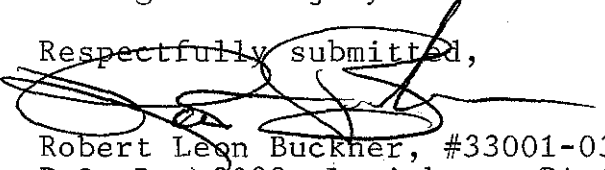
3.) That Plaintiff will continue to suffer serious bodily and psychological injury if the denial of his medication regimen continues. 1. That is, the medicinal regimen for the control of his severe Meniere's disease: at minimal -- the combination of meclizine at 25 milligrams and clonazepam at 1 milligram, administered three times a day. 2.

4.) That your Plaintiff request's this Court to cause the issuance of a temporary preliminary injunction and/or restraining order that will direct the Defendant's to recontinue Plaintiff on his prior medicinal regimen, at minimum as stated above, inasmuch as your Plaintiff will suffer from irreparable damage to his body and mind without said treatment.

5.) That your Plaintiff moves this Honorable Court to give liberal construction to his pleadings or, in the alternative, to appoint effective counsel to represent him in further litigation in this matter. Haines v. Kerner, 404 U.S. 519, 520, 92 S.Ct. 594 595, 30 L.Ed.2d. 652 (1972); Fischer v. Cahill, 474 F.2d 991, 993 (3rd Cir. 1973).

WHEREFORE, your Plaintiff moves this Honorable Court for an emergency preliminary injunction and/or restraining order that enjoin Defendant's from retaitory acts against Plaintiff and order Defendants to recontinue his medicinal regimen as outlined above so as to insure against any further irreparable damage and injury.

Respectfully submitted,


Robert Leon Buckner, #33001-037
P.O. Box 2000, Lewisburg, PA 17837

DATE: November 12, 2000.

1. Since the filing of this action, Dr. Bussanich has completely discontinued all of Plaintiff's clonazepam and, because of the discontinuation, Plaintiff has suffered from the debilitating symptoms which have caused him numerous physical injuries as well as suffering from the symptoms themselves; severe vertigo, tinitus, nausea, headaches, etc.

2. Although Plaintiff's regimen in the past has been meclizine at 25 milligrams and **clonazepam** at **2 milligrams** administered three times a day, nevertheless he seeks only "minimal" relief at this point with clonazepam at 1 milligram to be administered three times a day with his meclizine 25 milligrams.

